

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY ZARA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:16-cv-05156
)	
DEVRY EDUCATION GROUP, INC.;)	Honorable Judge Andrea R. Wood
DEVRY MEDICAL INTERNATIONAL,)	Magistrate Judge Sidney Schenkier
INC.; ROSS UNIVERSITY SCHOOL OF)	
MEDICINE, SCHOOL OF VETERINARY)	
MEDICINE (ST. KITTS) LIMITED; and)	
ALEXA FERRARI)	
)	
Defendants.)	

DECLARATION OF JEFFREY MICHAEL FAZIO

I, JEFFREY MICHAEL FAZIO, declare under penalty of perjury that the following statements are true:

1. I am over 18 years of age.
2. My statements in this declaration are based on my own personal knowledge.
3. I am currently employed by Ross University School of Medicine, School of Veterinary Medicine (St. Kitts) Limited as the Student Engagement and Professional Standards Specialist at Ross University School of Veterinary Medicine ("Ross").
4. Albert Du Plessis is Ross's Director of Safety and Security and has been in that position since before April 2016.
5. Hazarie Ramoutar is Ross's Director of the Student Experience and has been in that position since before April 2016.
6. Dr. Charles Edward Wallace is Ross's Interim Associate Dean for Student and Alumni Affairs.

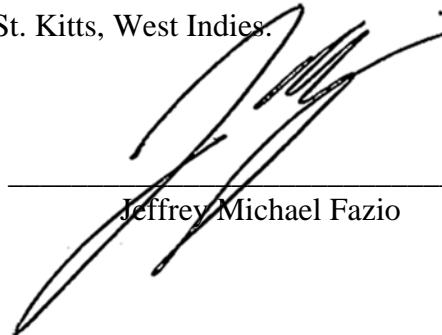
7. On April 15, 2016, Ross held a Student Conduct Panel Hearing in St. Kitts to evaluate Anthony Zara's conduct and determine whether disciplinary action would be appropriate. In addition to me, the Conduct Panel presiding over the hearing and making the disciplinary decision based on the hearing consisted entirely of Ross faculty members: Dr. Eric Pope, Dr. Mary Anna Thrall, Dr. Fortune Sithole, and Dr. Christa Ann Gallagher.

8. In addition to Mr. Zara, Mr. Zara and Ms. Ferrari's former landlords David and Laura Wright and six Ross University students testified at the Student Conduct Panel Hearing. According to testimony offered at the hearing, the Wrights witnessed events incident to Mr. Zara's and Ms. Ferrari's relationship and co-habitation, and the students each witnessed some portion of Mr. Zara's actions on the night of April 6, 2016.

9. Three Ross Security Officers also testified at the hearing: Leroy Swanston, Tanaca Browne, and Devon Warner. According to testimony offered at the hearing, Officers Browne, Swanston, and Michael Williams all witnessed Mr. Zara's arrest by the St. Kitts police on the night of April 6, 2016.

10. I live in St. Kitts. With the exception of Mr. Zara, every other individual named in this declaration is currently living in St. Kitts.

Executed this 8th day of June in Basseterre, St. Kitts, West Indies.



Jeffrey Michael Fazio